

Remarks

Claims 1 - 3, 8 - 10, 15 – 22, 24 – 27 and 29 are amended. Claims 30 – 34 are added. No claims are cancelled. Claims 1 – 34 are pending. Reexamination and reconsideration of this application, as amended, are respectfully requested.

The Examiner has rejected claims 15 - 19 under 35 U.S.C. § 112, second paragraph, for failing to set forth the subject matter regarded as the invention. This rejection is respectfully traversed.

The Examiner asserts that that the applicants have suggested that the "invention" provides a particular result at pages 1 - 2 of the specification and that claims 15 – 19, as recited, do not set forth "input validation or how to validate user input at the client terminal, claims' language rather direct to conventional input validation at server terminal." First, the applicants respectfully point out that pages 1 – 2 merely point out background information as suggested and in no way is intended to characterize the invention. Second, this ground of rejection under 35 U.S.C. § 112, second paragraph, "is to be used only where the application has stated, ***somewhere other than in the application, as filed***, that the invention is something different from what is defined in the claims(s)." MPEP § 706.03(d) (Examiner Note to ¶ 7.34, emphasis added). Unless the Examiner cites specific documents (other than the present application as filed) where the applicants characterized the "invention" differently, the applicants respectfully request withdrawal of this rejection.

The Examiner deems claims 15 – 19 to recite "conventional input validation at server terminal [sic]." The applicants request that to the extent the Examiner deems these claims to be unallowable for merely reciting "conventional" subject matter, the

Examiner cite a particular reference in a formal rejection under 35 U.S.C. §§ 102 or 103 and withdraw this rejection under 35 U.S.C. § 112, second paragraph.

The Examiner also rejected claims 15 – 19 for having an indefinite preamble. The applicant has amended the preamble of these claims to be directed to an “article of manufacture” at the suggestion of the Examiner.

The Examiner also suggests that certain claims using the phrase “communication interface(s)” should be more clearly defined. The applicants have amended the claims to recite at least a “first communication interface being adapted for receiving inputs . . . according to a first Internet compliant protocol” and a “second communication interface being adapted for receiving inputs according to a second Internet compliant protocol.”

The Examiner has rejected claims 1 – 29 as being anticipated by, or made obvious in view of, U.S. Patent No. 6,393,468 to McGee (the “468 patent”) under 35 U.S.C. §§ 102 (e), 103 (a). This rejection is respectfully traversed.

The specification of the present application relates to, among other things, a validation engine that is capable of validating inputs to a single application from multiple communication interfaces. With reference to Figure 1, an IP server 14 is capable of communicating with multiple client devices over the Internet 26 according multiple Internet compliant protocols (e.g., VoIP, SNMP, HTTP, e-mail). A validation engine 16 may determine Internet protocol specific validation criteria for each communication interface to receive inputs to the application 10 according to the specific Internet protocol. Therefore, depending on the specific Internet protocol used for receiving inputs to the application 10, the associated communication interface can use a protocol

specific technique for validating the input (e.g., scripts executed on the client device for inputs received according to HTTP or validation of inputs at the IP server 14 for VoIP).

With reference to Figure 7, the '468 patent appears to show an authentication procedure for an Internet server 300 shown in Figure 3. The Internet server 300 comprises a gateway manager 340 and a session manager 320 to authenticate login information from a browser and provide an error web page back to the browser in the event of an error. ['468 patent, col. 10, l. 63 – col. 11, l. 11] Figure 7 further describes attempts to match a tokenized URL at a step 710 and determine a valid identity at step 720. If a valid identity is not found at step 710, the session manager returns a login page HTML file to initiate a login procedure. The process illustrated with reference to Figure 7 appears to be limited to processing inputs according the HTTP protocol. ['468 patent, col. 12, ll. 32 – 55]

Claim 1 distinguishes over the device shown in the '468 patent by reciting, among other things:

a first communication interface being adapted for receiving inputs from the client process according to a ***first Internet compliant protocol*** and a second communication interface being adapted for receiving inputs according to a ***second Internet compliant protocol distinct from the first Internet compliant protocol***; and

a validation engine to ***define Internet protocol specific validation criteria for inputs to the application according to at least the first and second Internet compliant protocols***, and to provide validation data representative of the validation criteria for inputs to the application according to the first Internet compliant protocol in response to a query from the first communication interface. . . [emphasis added]

The '468 patent, merely showing a process for login validation for an HTTP server, does not disclose, suggest or make obvious defining "Internet protocol specific

validation criteria for inputs to the application according to at least the first and second Internet compliant protocols" as recited in claim 1. Accordingly, the applicant respectfully submits that claim 1, and claims 2 through 7 depending therefrom, distinguish over the '468 patent. While differing in scope from claim 1 at least in part, the remaining claims recite limitations which are similar to those in claim 1 which are quoted above. Accordingly, the applicant respectfully submits that these claims similarly distinguish over the device shown in the '468 patent.

In connection with rejections under 35 U.S.C. § 103 (a), the Examiner asserts that validation of inputs provided according to SNMP, VoIP or telephony were known to those of ordinary skill in the art. These rejections are buttressed by little more little more than conclusory statements citing no additional references to be combined with the '468 patent. To the extent the Examiner still deems any claims obvious in view of the claim amendment and remarks in this response, the applicants respectfully request that the Examiner set out a complete case for prima facie obviousness with citations to specific references showing all limitations of the claims at issue. The applicants remind the Examiner that a prima facie case of obviousness under 35 U.S.C. § 103(a) first requires that there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. . . The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. *In re Vaech*, 947 F.2d 488, 20 USPQ2d

1438 (Fed. Cir. 1991). Manual of Patent Examining Procedure (MPEP), 8th Edition, August 2001, § 2143.

The applicants respectfully submit that the application is now in form for allowance. Reconsideration of this case is respectfully requested. Please charge Deposit Account #02-2666 for any fee payment deficiencies associated with this case. If the Examiner finds that this case is in any way not in proper form for allowance, the applicant requests that the Examiner contact the applicants' representative at (310) 252-7621.

Respectfully submitted,

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by 

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